

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON	:	Civil Action No. 3:16-md-2738-FLW-LHG
TALCUM POWDER PRODUCTS	:	
MARKETING, SALES PRACTICES	:	
AND PRODUCTS LIABILITY	:	MDL No. 2738
LITIGATION	:	
	:	
	:	
This Document Relates to: All	:	
Plaintiffs	:	
	:	

CROSS-NOTICE OF ORAL AND VIDEOTAPED DEPOSITION OF
STEVEN MANN

PLEASE TAKE NOTICE that, in connection with *Vickie Forrest v. Johnson & Johnson, et al.*, Case No. 1522-CC00419-02, in the Circuit Court of the City of St. Louis, State of Missouri, Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc. (“Johnson & Johnson Defendants”), pursuant to the Federal and Missouri Rules of Civil Procedure, cross-notice the videotaped deposition upon oral examination of **Steven Mann**, before a person duly authorized to administer oaths, on **April 8, 2021 at 9:00 a.m. EST via video conference**, pursuant to the *Second Amended Notice of Videotaped (Remote) Deposition of Steven Mann*, as served and attached as Exhibit “A” hereto.

The deposition will be conducted pursuant to the provisions of the Federal and Missouri Rules of Civil Procedure. You may appear and examine the witness following completion of the *Mann* deposition.

Dated: March 25, 2021

s/ Susan M. Sharko

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Attorneys for Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc.

CERTIFICATION OF SERVICE

I hereby certify that I have, on this 25th day of March, 2021, caused the foregoing Cross-Notice of Oral and Videotaped Deposition of Steven Mann to be served on all counsel of record via ECF, including:

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Jessica L. Brennan

Jessica L. Brennan

EXHIBIT A

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
STATE OF MISSOURI

VICKIE FORREST, et al.,

Plaintiffs,

vs.

JOHNSON & JOHNSON, et al.,

Defendants

Case No. 1522-CC00419-02

Division 1

**SECOND AMENDED NOTICE OF VIDEOTAPED
(REMOTE) DEPOSITION OF STEVEN MANN**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Rule 57 of the Missouri Rules of Civil Procedure, Plaintiffs, by their undersigned attorneys, shall take the videotaped deposition of **Steven Mann**, in the above-referenced matter. The deposition which shall be taken by videotape and stenographic means before a certified court reporter or other person authorized to administer oaths will be conducted remotely via Zoom video conference services., on **Thursday, April 8, 2021**, at **9 a.m. EST**, as agreed upon by all parties, and will continue from day to day until completed. The deposition will be taken before Golkow Reporting. The deponent and all persons wishing to attend the deposition shall provide counsel for Plaintiffs with their email addresses no later than four days before the deposition

The witness is required to bring/produce true, correct and complete copies of all documents as referred to in **Schedule A** attached hereto, no later than five (5) business days prior to the deposition.

SCHEDULE "A"
Subpoena Duces Tecum

The deponent shall make the following documents and things available for the purposes of inspection and copying:

DEFINITIONS:

The term "document(s)" means and refers to all forms of writings and records, and includes any reduction to tangible form, including computer or magnetic memory or storage, or any other electronically stored information, communication, or data, including any written, recorded, or filmed graphic matter of any kind or nature, however produced or reproduced, including originals, drafts, and non-identical copies, wherever located including, but not limited to, documents and records held or stored on hospital servers, databases, networks, shared networks, local and remote drives, and local and remote drives of individuals.

DOCUMENTS REQUESTED:

1. A copy of the witness's current or most recent resume or curriculum vitae;
2. Any and all documents in the witness's possession, custody, or control which discuss, mention, consider, or contemplate the presence of asbestos in talcum powder products;
3. Any and all documents in the witness's possession, custody, or control which discuss, mention, consider, or contemplate the presence of asbestos in Johnson's Baby Powder;
4. Any and all documents in the witness's possession, custody, or control which discuss, mention, consider, or contemplate the association between talcum powder products and ovarian cancer;
5. Any and all documents in the witness's possession, custody, or control which discuss, mention, consider, or contemplate the association between Johnson's Baby Powder and ovarian cancer;
6. Any and all documents in the witness's possession, custody, or control which discuss, mention, consider, or contemplate the association between asbestos and ovarian cancer;
7. Any and all documents in the witness's possession, custody, or control which discuss, mention, consider, or contemplate the International Agency for Research on Cancer's (IARC) consideration of talc as a human carcinogen;

8. Any and all documents in the witness's possession, custody, or control which reflect communications with any Johnson and Johnson entity or employee after the witness left employment with Johnson and Johnson;
9. Any and all documents in the witness's possession, custody, or control which reflect communications with any Johnson and Johnson entity or employee, after the witness left employment with Johnson and Johnson, regarding talcum powder products;
10. Any and all documents in the witness's possession, custody, or control which reflect communications with any Johnson and Johnson entity or employee, including its lawyers, regarding talcum powder products;
11. Any and all documents in the witness's possession, custody, or control which reflect communications specifically with Susan Nicholson, MD after the witness left employment with Johnson and Johnson;
12. Any and all documents in the witness's possession, custody, or control which reflect communications specifically with the Food and Drug Administration (FDA) regarding talcum powder products;
13. Any and all documents in the witness's possession, custody, or control which reflect communications specifically with Rich Zazenski regarding talcum powder or talcum powder products; and
14. Any and all documents in the witness's possession, custody, or control which refer or relate to, in any way, the following specific individuals or entities regarding talcum powder products:
 - a. Imerys or any of its predecessor companies or entities;
 - b. Rio Tinto or any of its predecessor companies or entities;
 - c. Luzinac Group or any of its predecessor companies or entities;
 - d. Crowell & Morning LLP, including Ridgway M. Hall Jr.;
 - e. Robert Glenn;
 - f. any Meta-Analysis Research Group;
 - g. Joshua Muscat, MD;
 - h. Michael Huncharek; MD; and
 - i. Brooke Mossman, PhD.

Dated: March 24, 2021

Respectfully submitted,

ONDERLAW, LLC

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Certificate of Service

The undersigned hereby certifies that this document was filed and electronically served by way of the Court's electronic filing system on this 24th day of March, 2021.

/s/ W. Wylie Blair